1 2 3	Case 2:04-cy-00755-GEB-PAN Document ROBERT L. MEZZETTI II, SBN 114282 MEZZETTI LAW FIRM, INC. 31 East Julian Street San Jose, California 95112 (408) 279-8400 / (408) 279-8448 fax	nt 56 Filed 02/22/06 Page 1 of 3	
4 5	Attorney for Defendants THE WILLIFORD FAMILY PARTNERSHIP, L.P., a California limited partnership		
6			
7	UNITED STATES DISTRICT COURT		
8	EASTERN DISTRICT OF CALIFORNIA		
9 10 11 12 13 14 15 16 17 18	SUSAN BOWMAN, an individual; and DISABILITY RIGHTS ENFORCEMENT EDUCATION SERVICES; HELPING YOU HELP OTHERS, a California public benefit corporation, Plaintiffs, v. BEST WESTERN STATION HOUSE INN; THE WILLIFORD FAMILY PARTNERSHIP, L.P. a California limited partnership; BEST WESTERN INTERNATIONAL, INC., an Arizona corporation and LEWIS T. WILLIFORD an individual dba BEST WESTERN STATION HOUSE INN, Defendants. Defendants.	NO. CIV.S-04-0755 GEB PAN STIPULATION AND [PROPOSED] ORDER TO CONTINUE HEARING ON DEFENDANTS' MOTION FOR MONETARY SANCTIONS AGAINST THOMAS E. FRANKOVICH AND THE FRANKOVICH GROUP CURRENTLY SCHEDULED FOR: Date: February 27, 2006 Time: 9:00 a.m. Dept.: 10 Hon. Hon. Garland E. Burrell, Jr.	
20	Plaintiff, through her undersigned counsel, and	d Defendants, through their undersigned counsel,	
21	respectfully submit the following:		
22	WHEREAS, the Hearing on the the above-captioned matter is currently scheduled for February		
23	27, 2006, at 9:00 a.m., and the Reply Brief is currently	y due no later than February 17, 2006;	
24	WHEREAS, Plaintiff, by and through her coun	nsel, due to an inadvertent uploading and/or	
25	technical error, did not receive until February 15, 200	6, certain Exhibits to the Declaration of Robert L.	
26	Mezzetti II filed with the subject Motion and have not	t had adequate time to review and respond to said	
27	exhibits; and		
28	STIPULATION AND [PROPOSED] ORDER TO CONTINUE HEARING ON DEFENDANTS' MOTION FOR MONETARY SANCTIONS	CIV.S-04-0755 GEB PAN -1-	

1	Case 2:04-cv-00755-GEB-PAN .Document 56 Filed 02/22/06 Page 2 of 3 WHEREAS, in the interests of justice and judicial economy a continuance is warranted;		
2	THE PARTIES HEREBY STIPULATED AND REQUEST THAT THE COURT GRANT THE		
3	FOLLOWING:		
4	1. That the Hearing on the Motion for	Monetary Sanctions shall be continued until March	
5	27, 2006, at 9:00 a.m., in Department 10 of the above-entitled court.		
6	2. Plaintiff's Supplement Opposition papers regarding the missing exhibits "D" and "E"		
7	shall be filed and served by no later than March 6, 2006.		
8	3. Defendants' Reply papers shall be filed and served by no later that March 13, 2006.		
9			
10	IT IS SO STIPULATED.		
11			
12	It is further stipulated by and between counsel that this document may be executed in		
13	counterparts and sent by facsimile with the same force and effect of an original signature.		
14			
15	DATED:, 2006	MEZZETTI LAW FIRM, INC.	
16			
17		BY	
18		ROBERT L. MEZZETTI II Attorneys for Defendant THE WILLIFORD	
19		FAMILY PARTNERSHIP, L.P., a California	
20		limited partnership	
21	DATED:, 2006	THOMAS E. FRANKOVICH A PROFESSIONAL LAW CORPORATION	
22			
23		BY	
24		Julia M. Adams	
25	///	Attorneys for Plaintiff, SUSAN BOWAN	
26			
27	/// ///		
28			
	STIPULATION AND [PROPOSED] ORDER TO CONTINUE HEARING ON DEFENDANTS' MOTION FOR MONETARY	CIV.S-04-0755 GEB PAN	
	SANCTIONS	-2-	

1	DATED:, 2006 Document 56 Filed 02/22/06 Page 3 of 3 BONETATI, SASAKI, KINCAID & KINCAID, INC.	
2	INC.	
3		
4	BY Laura M. Sasaki	
5	Attorneys for Defendant BEST WESTERN INTERNATIONAL, INC.	
6		
7	<u>ORDER</u>	
8	IT IS SO ORDERED.	
9	Dated: February 21, 2006	
10		
11	/s/ Garland E. Burrell, Jr. GARLAND E. BURRELL, JR.	
12 13	United States District Judge	
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